



January 25, 2017

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Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

SUBJECT: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR
for POC-I LLC (Facility ID: 1769650)

Dear Mr. Tsirigotis:

On December 12, 2016, POC-I LLC (POC) received a letter from the Environmental Protection Agency (EPA) requesting information on all their owned and operated oil and gas production facilities. Respectfully, POC requests an extension of 60 days to respond to the Part 1 request and an extension of 90 days to respond to the Part 2 request.

POC operations in Wyoming consist of a number of older wells that have not been integrated into an online electronic filing system where data is readily retrievable. Because of this, a field-wide site inventory will need to be completed by POC operations personnel in addition to their daily duties. The 60-day extension will allow accurate data gathering for proper filing to meet all of the Part 1 ICR requirements.

The Part 2 requests extensive information on the operation, production, equipment, and fluid characteristics of each well. With the minimum time expected to complete each Part 2 request estimated at approximately 38 hours, additional time will be needed to conduct site visits, retrieve average operating conditions, and sample liquids. Additionally, most environmental work for POC is completed by a third-party environmental contractor resulting in time for data transfer and review by the POC responsible official before certification of the report. The 90-day extension for POC to complete the Part 2 request affords us the necessary time to gather all of the required information.

Along with the intense nature of the requested information and POC's ability to gather it, these information collection requests come at a time when other federally required reports are due such as SARA Tier II, greenhouse gas, and state emission inventories. The staff needed to complete all required reports is not available further substantiating the need for the extension for the Part 1 and Part 2 ICR.



Please contact myself at (b) (6)@prellc.com or (b) (6) with Kleinfelder at (b) (6) or (b) (6)@kleinfelder.com should you have any questions. Thank you for your assistance in this matter

Respectfully

(b) (6)

POC-I LLC – Vice President, Operations

cc:

(b) (6)

Kleinfelder, Inc. – Air Quality Professional